

1  
2  
3  
4  
5  
6  
7 UNITED STATES DISTRICT COURT  
8 FOR THE WESTERN DISTRICT OF WASHINGTON

9 JACOB STRUIKSMA,

10 Plaintiff,

11 vs.

12 ZONES, INC., a Washington Corporation and  
13 APOLLO PROFESSIONAL SOLUTIONS,  
INC.,

14 Defendant.  
15

Case No. 2:18-cv-00188-RSM

**STIPULATION AND ORDER  
EXTENDING DEADLINES**

16 **STIPULATION**

17 The parties hereby file this stipulated motion pursuant to LCR 7(d)(1) and LCR 10(j) to  
18 extend the deadline for FRCP 26(f) Conference, Initial Disclosures Pursuant to FRCP 26(a)(1),  
19 and Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local  
20 Civil Rule 26(f). The court order (Dkt. #5) set deadlines as follows:

21 FRCP 26(f) Conference: 3/8/2018

22 Initial Disclosures Pursuant to FRCP 26(a)(1): 3/15/2018

23 Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local  
24 Civil Rule 26(f): 3/22/2018.

25 After moving the Answer deadline out to facilitate settlement discussions, it became  
26 necessary to move the other deadlines to accommodate settlement discussions and to save our

STIPULATION AND ORDER  
EXTENDING DEADLINES 1

-  
Conrad A. Reynoldson  
WASHINGTON CIVIL & DISABILITY ADVOCATE  
3513 NE 45<sup>th</sup> Street, Suite G  
Seattle, WA 98105  
(206) 855-3134

1 client's the unnecessary fees. The parties, therefore, join in respectfully asking the Court to  
2 extend the deadlines as follows:

3 Deadline for FRCP 26(f) Conference: 4/9/2018

4 Initial Disclosures Pursuant to FRCP 26(a)(1): 4/16/2018

5 Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local  
6 Civil Rule 26(f): 4/23/2018.

7  
8 Dated: March 13, 2018

9  
10 LABARRE LAW OFFICES, P.C.

11 /s/ Scott LaBarre

12 Scott LaBarre, *admitted pro hac vice*

13 LaBarre Law Offices, P.C.

14 1660 S. Albion, STE 918

15 Denver, CO 80222

16 303-504-5979

17 Email: slabarre@labarrelaw.com

18 WASHINGTON CIVIL & DISABILITY  
19 ADVOCATE

20 /s/ Conrad Reynoldson

21 Conrad Reynoldson

22 Washington Civil and Disability

23 3513 NE 45th St., Suite G

24 Seattle, WA 98105

25 206-855-3134

26 Email: conrad@wacda.com

*Attorneys for Plaintiff*

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

/s/ Laurence A. Shapero

Laurence A. Shapero, WSBA #31301

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

800 Fifth Avenue Suite 4100

Seattle, WA 98104

Phone: 206-693-7057

Fax: 206-693-7058

Email: laurence.shapero@ogeltree.com

*Attorney for Zones, Inc.*

NORTHCRAFT, BIGBY & BIGGS, P.C.

/s/ Aaron Bigby

Aaron D. Bigby, WSBA # 29271

Northcraft, Bigby & Biggs, P.C.

819 Virginia St., Suite C-2

Seattle, WA 98101

Email: aaron\_bigby@northcraft.com

*Attorneys for Apollo Professional Solutions,  
Inc.*

**ORDER**

Pursuant to the parties stipulated request for such relief, the court extends the FRCP 26 deadlines as follows:

Deadline for FRCP 26(f) Conference: 4/9/2018

Initial Disclosures Pursuant to FRCP 26(a)(1): 4/16/2018

Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): 4/23/2018.

DATED this 14<sup>th</sup> day of March 2018.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE